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# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

JUN 26 1987

OFFICE OF PESTICIDES AND TOXIC SUBSTANCES

#### MEMORANDUM

SUBJECT: Protocol Change to Maneb and ETU Storage Stability Studies

in 3/31/87 Maneb DC1 [RCB No. 2471] No Accession No.

FROM:

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THRU:

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TO:

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and

Henry F. Jacoby Science Integration Staff

Hazard Evaluation Division (TS-769)

RCB has been asked by the DCl staff to review and develop an appropriate response to the June 16, 1987 letter by Joseph D. Panetta, Chairman, Maneb Task Force to J. Warshawsky SRB, RD, requesting a protocol change Re: RAC Stability Study Protocol.

#### Present Consideration

# Joseph D. Panetta (MTF) letter dated 6/16/87

### Petitioner's Remarks

Since it has been decided by the Maneb Task Force not to include spinach on the maneb label and therefore not conduct any residue work pertaining to spinach, the Maneb Task Force hereby requests that spinach be replaced on the RAC Storage Stability study protocol with another crop from another vegetable group. Because lettuce belongs to the same family as spinach, the Maneb Task Force proposes to use a crop from the root and tuber vegetable The alternative crop would be potatoes.

### RCB's Comments/Conclusions

RCB has no objections to the Maneb Task Force's selection of potatoes as an alternative crop, to spinach, for conducting the RAC storage stability studies as required by the 3/31/87 Maneb DC1.

#### Recommendations

The MTF should be advised that for the weathered residue phase to ensure that detectable weathered residues of Maneb are present on potatoes at time of entry into frozen storage, potatoes utilized for the proposed storage stability study may be treated in the field at exaggerated application rates (eg., 5 to 10X) or at the highest application rate which would not cause damage to the crop.